

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

TERESA L. KLINE
7114 Mason Street
District Heights, Maryland 20747

Plaintiff

v.

Case Number

CAL20-18700

WALMART INC.
7 South Walton Boulevard
Bentonville, Arizona 72716

SERVE: The Corporation Trust, Incorporated,
Resident Agent
2405 York Road, Suite 201
Lutherville Timonium, Maryland 21093

Defendant

CLERK OF THE
CIRCUIT COURT
JAN 16 PM 3:17
PR GE0 CO MD #55

COMPLAINT

Teresa L. Kline, plaintiff, by her attorney Benjamin A. Klopman, sues defendant Walmart Inc. and states the following as her complaint.

1. Plaintiff is a resident of Prince George's County, Maryland.
2. At all times pertinent hereto, defendant owned, operated and/or managed the Walmart Store located at 10600 Town Center Boulevard in Dunkirk, Maryland (hereinafter "Walmart Store") and presently owns and operates multiple stores in Prince George's County, Maryland.
3. Defendant regularly transacts business in Prince George's County, Maryland and, therefore, this Court has personal jurisdiction over the defendant and is a proper venue for resolution of plaintiff's claim set forth in this complaint.

4. On or about July 8, 2018, plaintiff visited the Walmart Store to do some shopping and on return to her motor vehicle, which was parked in the Walmart parking lot, she tripped over an unpainted wheel stop, which had been placed next to the white stripes of the parking lot.

5. The above unpainted wheel stop was not properly marked, was placed by the defendant next to the white parking stripes of the parking lot and was spaced less than three (3) feet apart from the adjacent wheel stop, in violation of safety codes and safe practices and, thereby, constituted an unsafe tripping hazard.

6. Because the unpainted wheel stop blended into the white parking lot stripes and was improperly spaced, plaintiff tripped over the wheel stop.

7. At all pertinent times hereto, plaintiff was exercising due care and caution for her own safety.

8. It was the duty of the defendant to use ordinary care and diligence to keep and maintain the parking spaces in the parking lot of the Walmart, including the above wheel stop, reasonably safe and free from defects and tripping hazards and conditions that would render the parking lot dangerous and unsafe for plaintiff or present an unreasonable risk of harm to plaintiff in her lawful use of the parking lot.

9. It was the duty of the defendant to exercise reasonable care to protect plaintiff from the danger of reasonably foreseeable injury occurring from reasonable foreseeable use of the parking lot of the Walmart Store by inspecting and taking other affirmative acts to address and/or remedy its defective condition, including any tripping hazard posed by the above wheel stop.

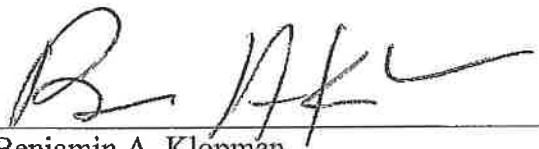
10. It was the duty of the defendant to use reasonable care in the placement of the above wheel stop in the parking lot of the Walmart Store in a manner consistent with any conformity with recognized standards of safety and safety codes.

11. The aforesaid acts of negligence on the part of the defendant in creating a tripping hazard in the parking lot of the Walmart were the proximate cause of the serious and debilitating injuries sustained by plaintiff as a result of her trip and fall on the unpainted and improperly spaced wheel stop in the parking lot of the Walmart Store.

12. As a result of the above-described negligence of the defendant, plaintiff has sustained serious, debilitating and permanent injuries, pain and suffering and mental anguish, and has incurred and will incur in the future medical bills and related expenses and losses, as well as a loss of income.

WHEREFORE, plaintiff Teresa L. Kline demands judgment against defendant Walmart Inc. in an amount that exceeds Seventy Five Thousand Dollars (\$75,000.00), plus interest and costs.

BENJAMIN A. KLOPMAN, CHARTERED

By: 
Benjamin A. Klopman

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Attorney for Plaintiff
Teresa L. Kline

DEMAND FOR JURY TRIAL

Plaintiff demands that her claim herein be decided by a jury of six (6) persons.



Benjamin A. Klopman